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ATTORNEYS FOR DEBTOR(S)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:

WILLIAM JAMES ALEXANDER
LORI RACHELLE ALEXANDER
Debtor(s)

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§

Case No. 03-47822-dml
Chapter 7

DEBTOR'S MOTION TO REOPEN CHAPTER 7 CASE
FOR THE LIMITED PURPOSE OF ENTERING INTO A
REAFFIRMATION AGREEMENT WITH MORTGAGE CREDITOR

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 501 W. TENTH STREET,, FORT WORTH, TX 76102-3643 BEFORE CLOSE OF BUSINESS ON NOVEMBER 24, 2010, WHICH IS AT LEAST 24 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW, WILLIAM JAMES ALEXANDER and LORI RACHELLE ALEXANDER, (the "Debtors"), who hereby moves the Court to reopen the above-captioned case pursuant to 11 U.S.C. §350(b) for the limited purpose of allowing Debtors and mortgage

creditor Chase Home Finance (formally Washington Mutual Home Loans) to enter into and file a Reaffirmation Agreement regarding Debtors homestead residential real property. In support thereof, Debtors would show the Court as follows:

1. On 8/14/2003 (the "Petition Date"), the Debtors filed a Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Code in the Northern District of Texas, Fort Worth Division, Case number 03-47822.
2. The Order discharging Debtors was entered on 01/08/2004. The Case was closed on 01/08/2004.
3. Debtors timely filed a *Schedule D* listing Washington Mutual Home Loans a secured creditor holding a mortgage and deed of trust on Debtor's residential real property.
4. Debtors timely filed a *Chapter 7 Individual Debtor's Statement of Intention* indicating an intent to reaffirm the debt to Washington Mutual Home Loans.
5. No reaffirmation agreement was filed regarding this debt.
6. Debtors have regularly and timely made payments towards this debt. Debtors recently learned these payments have gone unreported to the credit reporting agencies, thereby damaging their credit scores and making it difficult to obtain new credit or refinance the mortgage debt.
7. Debtors' Attorney has communicated this problem to counsel and employees of Chase Home Finance, and thereby determined that Chase Home Finance will begin reporting payments to the credit reporting agencies upon entry of a reaffirmation agreement.
8. Further, Chase Home Finance is prepared to create and file a reaffirmation agreement upon entry of an Order Reopening the Case.

WHEREFORE, PREMISES CONSIDERED, the Debtor(s) respectfully prays this Court reopen Debtors' Chapter 7 bankruptcy case for the limited purpose of entering into a reaffirmation agreement with Debtors' mortgage creditor and for such other relief to which the Debtor(s) may be justly entitled.

Dated: October 28, 2010

Respectfully Submitted,

THE FORD LAW FIRM, PLLC

By: /s/ Thomas Ford
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ATTORNEYS FOR DEBTOR(S)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2010, a true and correct copy of the foregoing was served on all parties in interest below.

DEBTORS:

William James Alexander
Lori Rachelle Alexander
3120 Riverwood Drive
Fort Worth, TX 76116

CHAPTER 7 TRUSTEE

Carey D. Ebert
177226 Chadwick Court, Suite 100
Hurst, TX 76054

U.S. TRUSTEE

Rm. 9C60
1100 Commerce Street
Dallas, TX 75242

CREDITOR

Chase Home Finance
Attn: OH4-7302
3415 Vision Dr.
Columbus, OH 43219

/s/ Thomas Ford
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ATTORNEY FOR DEBTORS